

DEPARTMENT OF
HEALTH AND ENVIRONMENTAL SCIENCES

AIR QUALITY BUREAU



STAN STEPHENS, GOVERNOR

COGSWELL BUILDING

STATE OF MONTANA

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HELENA, MONTANA 59620

July 5, 1989

CERTIFIED MAIL

Don Ryan
Columbia Falls Aluminum Co.
P. O. Box 10
Columbia Falls, MT 59912

Dear Mr. Ryan:

I have been in touch with Ms. Kris Knutson of the U.S. Environmental Protection Agency (EPA) Region VIII office in Denver concerning the enforceability issue of the opacity limits applicable to the potroom emissions at your facility. Recall that I have discussed this issue with both you and Ken Reick on a number of occasions.

The time has come for us to resolve the enforceability question and propose alternatives to EPA which will be acceptable. Therefore, I would appreciate it if you would begin work on possible alternatives as soon as possible.

Some of the alternatives which I have mentioned to Ms. Knutson are possible grain loading standards and/or mass emission limitation. These would require, as you know, a source testing technique to verify emissions.

If you feel that CFAC cannot come up with a viable alternative, I will present one for you. I would hope that together we can bring this issue to a close.

The Air Quality Bureau would have to present to EPA a state implementation plan (SIP) change request for their review and subsequent approval. However, once we get to that point, the ball will be in their court and one can only speculate on how long approval or rejection would take.

MC: LWS
GFP
AJC
K6R

Don Ryan
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Ms. Knutson has expressed a willingness to work with us on this issue and certainly we welcome her input.

Good luck!

Very truly yours,

A handwritten signature in black ink, reading "Harry Keltz". The signature is stylized with a large, looped "H" and a cursive "Keltz".

Harry Keltz, Supervisor
Engineering and Enforcement

HK:kh